

## **REMARKS**

Claims 1-24 are pending in the application. Applicants acknowledge that the amendments filed on August 11, 2005 have been entered. The Examiner relies on **Zhang** (US Patent Application No. 2005/0154895) to reject all of the pending claims. The Applicants traverse the Examiner's rejections for reasons more fully disclosed below.

Claim 1 is directed to a method, and is discussed first. Claim 1, in part, calls for determining a private key for a first network based on at least one security value associated with a second network. The term "private," by definition, refers to something that is generally not shared with public. It thus follows that a "private key" refers to a key that is typically not shared with others. Indeed, the patent application describes that a "private key," in the context of the claimed invention, refers to a key that, once calculated, is not shared with another device. *See* Patent Application, p.18, lines 10-12. Additionally, as the claim specifies, the "private key" is determined based on a security value associated with the second network.

The Examiner argues that claimed feature of "determining a private key" is disclosed by Zhang in the Abstract and in paragraph 24. Both the Abstract and paragraph 24 of Zhang describes two keys – a "public key" and a "session key." Neither of these keys, however, is a "private key," as called for by claim 1. As an initial matter, a "public" key, by definition, is not a "private" key. Moreover, Zhang describes that the "public key" is necessarily shared with another device, and in particular, with the WLAN sever to initiate a communications session. *See* Zhang, paragraph 24, (describing that the "public key" is transmitted from the user's device to the WLAN server, which then uses the public key to encrypt information to initiate a communication with the user's device). In contrast, as noted, the "private key" is not shared with another device. Additionally, there is no disclosure in Zhang that a "private key" is

determined based on a security value associated with the second network (which, according to the Examiner, is the 3G network in Zhang). The “public key” in Zhang is not determined based on a security value associated with the 3G network (“second network”); rather, Zhang describes that this key is simply belongs to the mobile unit. *See* Zhang, paragraph 24. Thus, for this additional reason, the “public key” of Zhang is not a “private key” referenced in claim 1.

The other key, “session key” described in Zhang is also not a “private key” as called for by claim 1. Like the “public key” of Zhang, the “session key” is also necessarily shared with other devices to establish a session. For example, Zhang describes that the “session key” is first transmitted from the WLAN server 230 to the 3G network, which then transmits it to the user device to establish a session. *See* Zhang, paragraph 24. Because the “session key” in Zhang is necessarily shared with another device after is determined, it cannot be the “private key” of claim 1.

The “session key” in Zhang is not the “private key” of claim 1 for an additional reason. Claim 1 specifies that the “private key” is determined for a first network based on a security value associated with the second network. The Examiner asserts that “WLAN” in Zhang corresponds to the “first network,” and the “3G” network in Zhang correspond to the “second network.” In Zhang, the “session key,” however, is not determined based on a security value associated with the 3G network (“second network,” according to the Examiner). Rather, as described in Zhang in paragraph 24, server 230 of the WLAN (“first network”) determines the “session key” once a registration message is received from the user device. The registration message includes the “public key” of the user device, but does not include any security value associated with the 3G network, as called for by claim 1.

Although the Examiner makes obviousness rejections by relying on secondary references, these references, however, do not cure the deficiencies discussed above. As such, in view of at least the aforementioned reasons, claim 1 and its dependent claims are allowable. Additionally, the other independent claims and their respective dependent claims are also allowable for the same reasons.

Arguments with respect to other dependent claims have been noted. However, in view of the aforementioned arguments, these arguments are moot and, therefore, not specifically addressed. To the extent that characterizations of the prior art references or Applicants' claimed subject matter are not specifically addressed, it is to be understood that Applicants do not acquiesce to such characterization.

For the aforementioned reasons, it is respectfully submitted that all claims pending in the present application are in condition for allowance. The Examiner is invited to contact the undersigned at (713) 934-4064 with any questions, comments or suggestions relating to the referenced patent application.

Respectfully submitted,

Date: May 18, 2007

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